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12 UNITED STATES BANKRUPTCY COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

14 In re  
15 PG&E CORPORATION,  
16 and,  
17 PACIFIC GAS & ELECTRIC COMPANY,  
18 Debtors.

19 Affects:

- 20 ☐ PG&E Corporation  
21 ☐ Pacific Gas & Electric Company  
22 ☒ Both Debtors

23 \* All papers shall be filed in Lead Case,  
24 No. 19-30088 (DM).

Case No. 19-30088 (DM)

Chapter 11

(Lead Case Jointly Administered)

EX PARTE MOTION OF THE SLF FIRE  
VICTIM CLAIMANTS PURSUANT TO  
B.L.R. 9006-1 REQUESTING ORDER  
SHORTENING TIME FOR HEARING ON  
MOTION FOR ORDER APPROVING  
STIPULATION BETWEEN DEBTORS  
AND SLF FIRE CLAIMANTS RE:  
GRANTING RELIEF FROM THE  
AUTOMATIC STAY TO JOIN  
INDISPENSABLE PARTIES

Related Document: Dkt. No. 3725

[No hearing requested]

1 TO THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY COURT  
2 JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE AND ALL INTERESTED  
3 PARTIES:

4 The SLF Claimants<sup>1</sup> (hereafter "**SLF Claimants**") in the above-captioned chapter 11 cases  
5 ("**Chapter 11 Cases**") of PG&E Corporation and Pacific Gas and Electric Company (collectively,  
6 the "**Debtors**" or "**PG&E**"), hereby submits this Motion ("**Motion to Shorten Time**"), pursuant to  
7 Rule 9006-1 of the Bankruptcy Local Rules for the United States Bankruptcy Court for the Northern  
8 District of California ("**Bankruptcy Local Rules**"), for entry of an order shortening time for a  
9 hearing on SLF's motion for entry of an order approving the stipulation ("**Stipulation**") entered in to  
10 between Debtors, the Ad Hoc Group of Subrogation Claim Holders, and the SLF Claimants (Dk. No.  
11 3725) ("**Motion**"). In support of this Application, the SLF Claimants submit the Declaration of Laila  
12 Masud ("**Masud Declaration**") filed concurrently herewith. A proposed form of order granting the  
13 relief requested herein is attached hereto as **Exhibit "1"** ("**Proposed Order**").

14 **MEMORANDUM OF POINTS AND AUTHORITIES**

15 **1. Jurisdiction**

16 The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334, the  
17 Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges, General Order 24 (N.D.  
18 Cal.), and Bankruptcy Local Rule 5011-1(a). This a core proceeding pursuant to 28 U.S.C. § 157(b).  
19 Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

20 **2. Basis for the Relief Sought**

21 Pursuant to Bankruptcy Local Rule 9014-1(c)(2), a hearing on the SLF Claimants Motion  
22 requires at least twenty-one (21) days' notice of an opportunity for a hearing. Bankruptcy Local Rule  
23 9006-1(a) provides that, except as set forth therein, "approval of the Court is required to enlarge or to  
24 \_\_\_\_\_

25 <sup>1</sup> Singleton Law Firm ("SLF") and Marshack Hays LLP, together with several other firms, represent  
26 approximately 5,300 victims of the fires started by PG&E Corporation ("PG&E") and/or Pacific Gas  
27 and Electric Company ("PGE Company," collectively with PG&E the "Debtors") in 2015 ("Butte  
28 Fire"), 2017 (the twenty fires generally referred to as the "North Bay and Wind Complex Fires") and  
2018 ("Camp Fire"). The claimants represented by SLF, Marshack Hays LLP and other firms are  
jointly referred to as the "SLF Claimants."

1 shorten time to perform any act or file any paper pursuant to the Federal Rules of Civil Procedures,  
2 the Bankruptcy Rules, or these Bankruptcy Local Rules," B.L.R. 9006-1(a). The SLF Claimants  
3 request that notice be shortened to permit the Motion to be heard as soon as possible, preferably  
4 within the next week. The SLF Claimants request that the Court allow any objection to be made  
5 orally at the hearing.

6 Here, SLF Claimants seek relief from stay in order to join certain indispensable parties that  
7 were inadvertently left out of a previous request for relief from stay. Generally, relief from stay may  
8 be granted to try mass tort personal injury claims when abstention would promote settlement, when  
9 liability is at issue, and when determination of the claims is in the public interest. In this case, the  
10 court has granted relief from stay for certain preference plaintiffs, indispensable parties and  
11 respective insurers to proceed towards a trial with respect to the Tubbs Fire. Unfortunately, certain  
12 indispensable parties related to the SLF Claimants were inadvertently not included in the relief  
13 requested. By this motion, SLF Claimants seeks approval of the Stipulation that allows those specific  
14 indispensable parties to be granted relief from stay to proceed in any Tubbs Fire litigation.

### 15 **3. Notice**

16 Notice of this Motion to Shorten Time will be provided to (i) the Debtors, c/o PG&E  
17 Corporation and Pacific Gas and Electric Company, PO Box 770000, 77 Beale Street, San Francisco,  
18 CA 94105 (Attn: Janet Loduca, Esq.); (ii) Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New  
19 York, New York 10153 (Attn: Stephen Karotkin, Esq., Jessica Liou, Esq., and Matthew Goren,  
20 Esq.), proposed attorneys for the Debtors; (iii) Keller & Benvenuti LLP, 650 California  
21 Street, Suite 1900, San Francisco, CA 94108 (Attn: Tobias Keller, Esq. and Jane Kim, Esq.),  
22 proposed attorneys for the Debtors; (iv) Stroock & Stroock & Lavan LLP, 180 Maiden Lane,  
23 New York, NY 10038-4982 (Attn: Kristopher M. Hansen, Esq., Erez E. Gilad, Esq., and Matthew  
24 G. Garofalo, Esq.) and 2029 Century Park East, Los Angeles, CA 90067-3086 (Attn: Frank A.  
25 Merola, Esq.), as counsel for the administrative agent under the Debtors' debtor-in-possession  
26 financing facility; (v) Davis Polk & Wardwell LLP, 450 Lexington Avenue, New York, NY 10017  
27 (Attn: Eli J. Vonnegut, Esq., David Schiff, Esq., and Timothy Graulich, Esq.), as counsel for the  
28 collateral agent under the Debtors' debtor-in-possession financing facility; (vi) Paul, Weiss, Rifkind,

1 Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019-6064 (Attn:  
2 Alan W. Kornberg, Esq., Brian S. Hermann, Esq., Walter R. Rieman, Esq., Sean A. Mitchell,  
3 Esq., and Neal P. Donnelly, Esq.), as counsel to the California Public Utilities Commission; (vii) the  
4 Office of the United States Trustee for Region 17, 450 Golden Gate Avenue, 5th Floor, Suite  
5 #05-0153, San Francisco, CA 94102 (Attn: James L. Snyder, Esq. and Timothy Laffredi,  
6 Esq.); (viii) U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001 (Attn:  
7 General Counsel); (ix) U.S. Department of Justice, 1100 L Street, NW, Room 7106, Washington  
8 DC 20005 (Attn: Danielle A. Pham, Esq.) as counsel for United States on behalf of the Federal  
9 Energy Regulatory Commission; (x) Milbank LLP, 55 Hudson Yards, New York, NY 10001-  
10 2163 (Attn: Dennis F. Dunne, Esq. and Sam A. Khalil, Esq.) and 2029 Century Park East,  
11 33rd Floor, Los Angeles, CA 90067 (Attn: Paul S. Aronzon, Esq., Gregory A. Bray, Esq., and  
12 Thomas R. Kreller, Esq.), as counsel for the Official Committee of Unsecured Creditors; (xi) Baker  
13 & Hostetler LLP, 1160 Battery Street, Suite 100, San Francisco, CA 94111 (Attn: Robert A. Julian,  
14 Esq., and Cecily A. Dumas, Esq.) and 11601 Wilshire Blvd., Suite 1400, Los Angeles, CA 90025  
15 (Attn: Eric E. Sagerman, Esq., and Lauren T. Attard, Esq.), as counsel for the Official Committee of  
16 Tort Claimants; (xii) and those persons who have formally appeared in these Chapter 11 Cases and  
17 requested service pursuant to Bankruptcy Rule 2002. The SLF Claimants respectfully submits that  
18 no further notice is required.

19 No previous request for relief sought herein has been made by the SLF Claimants to this or  
20 any other court.

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1 Accordingly, the SLF Claimants respectfully request entry of an order granting the Motion to  
2 Shorten time, and for such other and further relief as the Court may deem just and appropriate.

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4 Dated: August 27, 2019

MARSHACK HAYS LLP

5 /s/ Laila Masud

6 By: \_\_\_\_\_

7 RICHARD A. MARSHACK  
8 DAVID A. WOOD  
9 LAILA MASUD  
10 Attorneys for SLF CLAIMANTS

11 Dated: August 27, 2019

SINGLETON LAW FIRM, APC

12 /s/ Gerald Singleton

13 By: \_\_\_\_\_

14 GERALD SINGLETON  
15 GARY LOCURTO  
16 Attorneys for SLF CLAIMANTS